



U.S. Department of Justice

United States Attorney
Eastern District of New York

SK/JMH
F. #2013R00948

610 Federal Plaza
Central Islip, New York 11722

October 18, 2019

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

By Hand and ECF

★ **OCT 18 2019** ★

The Honorable Joseph F. Bianco
United States Circuit Judge
for the Court of Appeals, Second Circuit
100 Federal Plaza
Central Islip, New York 11722

LONG ISLAND OFFICE

Re: United States v. Philip A. Kenner and Tommy C. Constantine
Criminal Docket No. 13-607 (JFB)

Dear Judge Bianco:

The government respectfully submits this letter to request a further extension—until October 25—of the deadline to file its sentencing memorandum in the above-captioned matter. The government is requesting this extension in order to complete its response and address recent filings from the defendants. The government has conferred with defense counsel: Constantine's counsel consents to this motion and Kenner's stand-by counsel is attempting to reach his client. The government does not expect this request to affect the schedule for oral argument on the PSR objections or sentencing; oral argument is currently scheduled for November 14, 2019, and a sentencing date has not been set.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

Saritha Komatireddy
J. Matthew Haggans
Assistant U.S. Attorneys
(718) 254-7000

S/ JOSEPH F BIANCO

By: /s/

Joseph F. Bianco

USCJ (sitting by designation)

Date: Oct. 18 20 19

Central Islip, N.Y.

cc: All counsel of record (via ECF)

Philip A. Kenner, defendant pro se (via certified mail)

Request granted.